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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA**

RANDALL MENGES,

Plaintiff,

v.

TIM FOX, Attorney General of the
State of Montana; GARY SEDER,
Bureau Chief of the Montana
Crime Information Bureau; and
SARA MALIKIE, Head of the Sexual
and Violent Offenders Program
for the Missoula County Sheriff's
Office, each in their official
capacities,

Defendants.

Case No. 9:20-cv-178-DLC-KLD

**PLAINTIFF'S MOTION FOR
A PRELIMINARY
INJUNCTION**

Plaintiff Randall Menges moves this Court, under Federal Rule of Civil Procedure 65, for a preliminary injunction prohibiting the defendants, as well as their officers, agents, employees, attorneys, and any person who is in active concert or participation with them, from requiring him to register as a sex offender with the Montana Sexual or Violent Offender Registry. Menges also moves this Court for an order waiving the requirement for bond or security from him.

This motion is based on the brief in its support and the declarations of Randall Menges and Matthew Strugar filed with it, as well as Plaintiff's Request for Judicial Notice and the Complaint (ECF No. 1).

Menges makes this motion on the grounds that forcing him to register as a sex offender for his 1994 conviction for having consensual gay sex—a so-called “Crime Against Nature, Idaho Code § 18-660—is unconstitutional, as set out in his brief.

Date: December 29, 2020 Respectfully submitted,

/s/ Matthew Strugar
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